

## **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re: Methyl *tertiary* Butyl Ether ("MtBE")  
Products Liability Litigation

Master File No. 1:00-1898  
MDL No. 1358 (SAS)

This Document Relates To:

DECLARATION OF  
JEREMIAH J. ANDERSON

*New Jersey Department of Environmental  
Protection, et al. v. Atlantic Richfield Co., et al.*,  
Case No. 1:00-1898 (SAS)

I, Jeremiah J. Anderson, hereby declare and state as follows:

1. I am over 21 years of age, of sound mind, and fully competent to make this Declaration.

2. I am an attorney at law duly licensed to practice before all courts of the State of Texas and admitted *pro hac vice* in this matter. I am a partner with the firm of King & Spalding LLP, counsel for Defendant Chevron U.S.A. Inc. ("CUSA") in this matter. I have personal knowledge of the information set forth below, and I would testify to this information if called upon to do so.

3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of Plaintiffs' Responses to Defendants' First Set of Contention Interrogatories.

4. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiffs' August 9, 2013 response to CUSA's pre-motion letter.

5. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiffs' September 4, 2013 court-ordered supplemental correspondence to CUSA regarding the Skyline Service Center site.

6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the Expert Report of Dr. Michael Keeley and Amended Exhibit 1 to the Expert Report of Dr. Michael Keeley.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Declaration of Dr. Michael Keeley.

8. Attached hereto as Exhibit 6 is a true and correct copy of CUSA's August 9, 2013 pre-motion letter.

9. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the Second Rebuttal Report of Plaintiffs' Expert Martin Tallett.

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed at Houston, Texas, this 15<sup>th</sup> day of October, 2013.



Jeremiah J. Anderson